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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

18 This Document Relates to:

19 *ALL INDIRECT PURCHASER ACTIONS*

**DECLARATION OF WYATT M. CARLOCK
IN SUPPORT OF IRICO DEFENDANTS'
MOTION IN LIMINE #4 TO PRECLUDE
THE PARTIES FROM CONFLATING
CNEIECC WITH ANY IRICO ENTITY**

21 Judge: Honorable Jon S. Tigar
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1 I, Wyatt M. Carlock, declare as follows:

2 1. I am a member of the bar of the District of Columbia and admitted to practice before
3 this Court *pro hac vice*. I am an attorney with Baker Botts L.L.P., which represents Defendants
4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in support of
6 Irico Defendants’ Motion in Limine to Preclude Parties from Conflating CNEIECC with any Irico
7 Entity. If called as a witness, I could and would testify to the matters set forth in this declaration of
8 my own personal knowledge.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of Deposition Exhibit 8614,
10 which is a certified translation of a document produced by Irico in this litigation and bearing the
11 Bates label IRI-CRT-00003797-3799.

12 3. Attached hereto as Exhibit 2 is a true and correct copy of Deposition Exhibit 8397,
13 which is a certified translation of a document produced by Irico in this litigation and bearing the
14 Bates label IRI-00003669E.

15 4. Attached hereto as Exhibit 3 is a true and correct copy of Deposition Exhibit 8407,
16 which is a certified translation of a document produced by Irico in this litigation and bearing the
17 Bates label IRI-CRT-00003576E.

18 5. Attached hereto as Exhibit 4 is a true and correct copy of Deposition Exhibit 8615,
19 which is a certified translation of a document produced by Irico in this litigation and bearing the
20 Bates label IRI-CRT-00028800-8811.

21 6. Attached hereto as Exhibit 5 is a true and correct copy of Deposition Exhibit 8401,
22 which is a certified translation of a document produced by Irico in this litigation and bearing the
23 Bates label IRI-CRT-00002041-2105.

24 7. Attached hereto as Exhibit 6 is a true and correct copy of certified translation of a
25 document produced by Irico in this litigation and bearing the Bates label IRI-CRT-00000956-1010.

26 8. Attached hereto as Exhibit 7 is a true and correct copy of a certified translation of a
27 document produced by Irico in this litigation and bearing the Bates label IRI-CRT-00000508-511.
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9. Attached hereto as Exhibit 8 is a true and correct copy of Irco Defendants' Objections and Responses to Indirect Purchaser Plaintiffs Fourth Set of Interrogatories to Irco Group and Irco Display Devices Co., Ltd., dated February 23, 2022.

10. Attached hereto as Exhibit 9 is a true and correct copy of Deposition Exhibit 8610, which is a letter from Pillsbury Winthrop Shaw Pittman LLP, counsel for Irico Defendants at the time, to counsel for Indirect Purchaser Plaintiffs responding to Plaintiffs' Information Request, dated January 15, 2009.

11. Attached hereto as Exhibit 10 is a true and correct copy of Deposition Exhibit 8400, which is a pdf copy of an email sent by Pillsbury Winthrop Shaw Pittman LLP, counsel for Irico Defendants at the time, attaching a letter to counsel for Indirect Purchaser Plaintiffs responding to Plaintiffs' Information Request, dated January 15, 2009.

12. Attached hereto as Exhibit 11 is a true and correct copy of excerpts of the deposition of Yan Yulong, September 28-29, 2022.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th day of August, 2023, in Washington, D.C.

/s/ Wyatt M. Carlock

Wyatt M. Carlock (*pro hac vice*)
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